**YESHIVAT HAR ETZION**

**ISRAEL KOSCHITZKY VIRTUAL BEIT MIDRASH (VBM)**

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**Deracheha: Women and Mitzvot**

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**Tefillin III: In Practice**

**In practice, may a woman choose to lay *tefillin*? What are the practical halachic rulings?**

**By Deracheha Staff; Laurie Novick, Director**

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## Why might a woman seek a practical ruling to lay *tefillin*?

For some women, especially young women who attend *minyan* regularly in camp or school, watching male peers lay *tefillin* can trigger thoughts and feelings about what that experience is like and why women are excluded from it. A woman who takes care to recite *Shema* as part of prayer finds herself mentioning the significance of *tefillin* on a regular basis, and knows how significant voluntary mitzva performance can be. It is understandable, then, why a woman might have a sincere desire to wrap herself in *tefillin* as a physical expression of connection to God and Torah.

Although there are many women who do not feel this way and have no desire to lay *tefillin*, it is important to acknowledge with sensitivity and respect the women who have these feelings, and who may find the practical halachic rulings discussed below challenging.

# Maharam's Ruling

We saw in [Tefillin II](https://deracheha.org/tefillin-2-guf-naki) that Maharam of Rothenburg is particularly stringent about the requirement of *guf naki* as it applies to men. He is also the first to translate *guf naki* from a theoretical explanation for protesting women's laying *tefillin* to a practical halachic ruling.

In general, Maharam permits women to perform positive time-bound *mitzvot* voluntarily, with a *beracha*. He even permits women to wear *tzitzit* with a *beracha*. (See more [here](http://www.deracheha.org/tzitzit-2-yuhara).) But in his great overall concern for *guf naki*, Maharam rules stringently against women laying *tefillin*.[[1]](#footnote-1) Maharam's students, among them Rav Shimshon ben Tzadok, record his ruling:

*Tashbetz Katan* (Student of Maharam, in his name), 21

One should not protest their [women's] wrapping themselves in *tzitzit* and reciting a *beracha* on it because they can obligate themselves, as is proven in *Kiddushin* (31). But they should not lay *tefillin* because they do not know how to keep themselves in purity.

A person in a state of ritual impurity is permitted to lay *tefillin*, so the use of the term "*tahara*" (purity) is puzzling in this context. However, since parallel quotations of Maharam substitute the term "*nekiyut*" (cleanliness) for "*tahara*,"[[2]](#footnote-2) we can read *"tahara*" here as a synonym for cleanliness.[[3]](#footnote-3) Why did Maharam use this synonym? Perhaps he was concerned specifically about soiling from menstruation or from post-coital discharge, both of which also generate *tuma* (ritual impurity).[[4]](#footnote-4)

When Rav Yosef Karo discusses Maharam's ruling in his *Bet Yosef*, he explains that, although we usually follow the Talmud Bavli, Maharam rules stringently here out of concern for the position of the Talmud Yerushalmi and the Pesikta.[[5]](#footnote-5)

There were dissenting views on this issue at the time of the Maharam. As we [have seen](https://deracheha.org/tefillin-1-exemption), Rashba, Maharam's Sefardi contemporary, permits women to lay *tefillin* with a *beracha*, in keeping with the Bavli's seemingly permissive stance.[[6]](#footnote-6) Maharam's own student, Orchot Chayyim, questions Maharam's ruling in light of Rashba's, but leaves the question unresolved.[[7]](#footnote-7)

While Shulchan Aruch does not mention Maharam's concern here, Rema follows his ruling:

*Shulchan Aruch* OC 38:3

Women and bondsmen are exempt from *tefillin* because it is a positive time-bound commandment. Rema: If the women wish to be stringent on themselves [to lay *tefillin*] we protest.

Rema does not disparage women seeking to take on *tefillin*. On the contrary, he recognizes the impulse as a stringent one, seeking to take greater care with *mitzvot*. He does not use the language of prohibition. Even so, his halachic understanding is that such an act should meet with protest.

Among subsequent halachic authorities, Rema's ruling has remained largely uncontested,[[8]](#footnote-8) even among Sefardim. Additionally, it seems to apply to any act of a woman laying *tefillin*, no matter how brief, even if she seeks only to lay *tefillin* during *Shema* and prayers.[[9]](#footnote-9)

# Other Halachic Considerations

Aside from concerns about *guf naki*, halachic authorities discuss additional considerations that arise for a woman voluntarily laying *tefillin*: *keli gever* (cross-dressing), *yuhara* (spiritual haughtiness), and modesty.

**I. *Keli Gever***

*Tefillin* may violate the Torah's prohibition of cross-dressing:

*Devarim* 22:5

A man's article shall not be on a woman, neither shall a man wear a woman's garment; for whoever does these things is an abomination to the Lord your God.

Targum Yerushalmi, a translation of the Torah into Aramaic from *Eretz Yisrael* (precise date unknown), includes *tefillin* in the cross-dressing prohibition:

*Targum Yerushalmi Devarim* 22:5

There shall not be a cloak of *tzitzit* and *tefillin*, which are men's articles, on a woman.

However, the Babylonian Talmud's account of Michal bat Sha'ul laying *tefillin* does not mention *keli gever* at all. If a Torah-level prohibition were involved, we would have expected the sages mentioned there to have discussed it.

Rav Yechiel Ya'akov Weinberg argues that *keli gever* concerns do theoretically apply to *tefillin* – but not when a woman lays them in order to fulfill the mitzva:

Rav Yechi'el Ya'akov Weinberg, Responsa *Seridei Eish* II:41

"Michal bat Shaul laid *tefillin* and the sages did not protest it." This is difficult. Why didn’t they protest it? Is she not prohibited from wearing *tefillin* because of "a man's article shall not be on a woman"? It must be that, since her intention is for the sake of the mitzva, there is no prohibition here of not wearing [a man's garb].

On the viewpoint that there is a *keli gever* issue here, *tefillin* is more serious than *tzitzit*, because Halacha dictates the form and appearance of *tefillin*, so that *tefillin* cannot be modified or feminized in a readily visible way. (For more on *keli gever*, see [here](https://deracheha.org/tzitzit-1-keli-gever).)

Ben Ish Chai cites a kabbalistic source for the masculine nature of *tefillin*:

Responsa *Rav Pa'alim* I: *Sod Yesharim* 12

We find of our Rav [Arizal] in *Etz Chayyim*, Rectification of the Feminine, Chapter 1, that he wrote "From this, understand why women are exempt from *tefillin*, for Rachel does not have the external lights that are the secret of *tefillin* like Ya'akov has, etc."…This teaches us to prevent [women from laying *tefillin*], for a woman is not permitted to fulfill the mitzva on a voluntary basis like other positive time-bound mitzvot.

According to Ben Ish Chai's understanding of Arizal, there is some mystically masculine property inherent to *tefillin* with which women cannot connect.[[10]](#footnote-10)

**II. *Yuhara*** We have [seen](http://www.deracheha.org/tefillin-2-guf-naki) that both Maharshal and Aruch Ha-shulchan raise the theoretical possibility of permitting an exceptional woman to lay *tefillin*, should she also be sure about *guf naki*. Neither, however, issues a practical halachic ruling to permit it.

Why not? Perhaps because, if only very pious women may perform the mitzva voluntarily, then a woman makes a statement about her own level of piety when she lays *tefillin*. If she is not well-known for her piety, this raises the concern of *yuhara*, spiritual haughtiness, which can be a halachic reason to refrain from performing an action.[[11]](#footnote-11)

Maharam Schick (19th century Hungary, not to be confused with the medieval Maharam Rothenburg) argues that the Yerushalmi's record of protest against Michal's actions is based on *yuhara*.

Maharam Schick OC 15

It is *yuhara*…and there is a concern that also others will follow her example [Michal bat Sha'ul] although they are not scrupulous [with regard to matters of piety].

To Maharam Schick, even a woman known for being pious may be constrained by *yuhara* when it comes to laying *tefillin*. Additionally, there is a concern beyond *yuhara*, that an exceptionally scrupulous woman laying *tefillin* may lead astray other women who are less careful.

In [Tzitzit II: Yuhara](https://deracheha.org/tzitzit-2-yuhara), we discuss how performing an act in private may alleviate the issue of *yuhara*, because a person's private stringency is not *yuhara*, but a pious act known only to God. Rav Yitzchak Yosef rules this way with regard to a man who lays *tefillin* with the Torah portions arranged differently, known as *tefillin shel shimusha raba,* at *mincha*, in order to satisfy more than one opinion on which *tefillin* are fit for use:[[12]](#footnote-12)

*Yalkut Yosef*, *Tzitzit U-tfillin* 37:5

…In general it is not fitting to lay *tefillin shel shimusha rabba* at *mincha* publicly, in a place where no member of the community lays *tefillin* at *mincha*, for one should be concerned for *yuhara*. But a person who is known for his true piety is permitted to lay *tefillin shel shimusha rabba* at *mincha*, even in a place where the community do not lay *tefillin* at *mincha*. Anyone who lays them in private need not be concerned for *yuhara*.

Perhaps the same could be said for a woman who lays *tefillin* in private.

**III. Modesty** Although *guf naki* lies at the heart of Maharam's ruling, his student, Hagahot Maimoniyot, bases his objection to women laying *tefillin* on a different rationale:

*Hagahot Maimoniyot* (Student of Maharam), Laws of *Tzitzit* 3:40

I again found in the name of a great [scholar] that wherever there is a concern of a hint of transgression as in…laying *tefillin* because of uncovering *erva* [nakedness], since 'a woman's hair is [tantamount to] nakedness'…in all these types of cases we protest them [women].

Here, head-covering is the issue, not *guf naki*. In private, modesty would be less of a concern.

## How would laying *tefillin* present a modesty issue?

While not central to the halachic discourse, the mention of head-covering does point to practical difficulties. In the front of the head, *tefillin* must be placed above the hair line.[[13]](#footnote-13) At the back of the head, the head strap should also be visible. [[14]](#footnote-14) At least the *bayit* (box containing scrolls) on the head should not be covered with a garment (though there is some debate about loose coverage by a *tallit*).[[15]](#footnote-15) One should not have even a thin, cloth *chatzitza* (barrier) between the head and either *bayit* or strap.[[16]](#footnote-16) A light cap under the tefillin may be permitted when, say, there is an open wound, but not otherwise. Wigs or toupees present a halachic difficulty as well. [[17]](#footnote-17) Long hair in and of itself may be a *chatzitza*.[[18]](#footnote-18)

Putting these pieces together, a married woman seeking to lay the *tefilla shel rosh* would either have to do so with her head partially uncovered, or in private (following the opinions that a woman may freely uncover her head in private). (Alternatively, if she also wears a *tallit* (its own [halachic discussion](http://www.deracheha.org/tzitzit-1-keli-gever)) she might use the tallit as a cover up above her head.[[19]](#footnote-19))

Laying the *tefilla shel yad*, on the arm above the elbow, raises another modesty issue by revealing the upper arm,[[20]](#footnote-20) that is, unless a woman has a very loose sleeve or a *tallit* to work under, or is in private.

Lack of a women's tradition to lay *tefillin* translates into lack of a tradition for addressing these modesty-related concerns.

# Practical Rulings

Laying *tefillin* in private may alleviate some of the above halachic concerns. It still does not, however, mitigate the issue of *guf naki*. We lack a single, definitive understanding of the particular concern about women and *guf naki*, and that makes it more difficult for women to address.

With few exceptions,[[21]](#footnote-21) major halachic authorities over the past few hundred years do not permit a woman to lay *tefillin*.

Beyond technical halachic arguments, there is also the argument that laying *tefillin* contravenes tradition. This type of argument about *tefillin* is not of recent vintage; Shiltei Gibborim makes it five hundred years ago:

Shiltei Gibborim *Rosh Ha-Shana* 9b

So too it is prohibited for women to lay *tefillin*, even without a *beracha*, for it appears like 'the way of the separatists' (Mishna Megilla 4:8) who transgress the words of the sages and do not wish to expound the verses according them.

Shiltei Gibborim likens women laying *tefillin* to denying the authority of Torah She-be’al Peh. Of all positive time-bound *mitzvot*, he singles out *tefillin* as a high-stakes religious issue that defines a person's allegiances, and this attitude informs practical rulings.

## ● Can a woman rely on earlier halachic opinions, less concerned with guf naki?

In a letter explaining his decision to permit two of his female students to lay tefillin, high school principal Rav Tully Harcsztark wrote:[[22]](#footnote-22)

Rabbi Tully Harcsztark, Letter to Parents, January, 2014

"While our community has adopted as normative the view that women refrain from this act, I see the range of rishonim who allow women to don tefillin as support to give space to that practice within our community… I permitted our two female students to daven with tefillin because I believe that we should not be afraid of different forms of *avodat Ha-shem* when there is halakhic argument to support it."

This statement shows great sensitivity to the students and to making room for different approaches to halachic issues in the community. At the same time, the letter lacks reference to major rabbinic figures and halachic rulings of the past five hundred years. It marshals halachic backing for the decision solely from *rishonim* (early halachic decisors) and from the theoretical ability to construct a halachic argument in support of it.

In her essay on women and tefillin, Rabbanit Malka Puterkovsky explains why making a ruling of this sort isn’t tenable:

Rabbanit Malka Puterkovsky, “The Halacha of Women and Laying *Tefillin*,” *Mehalechet Be-darkah*, p. 151

Although in the era of the ”*rishonim*” there were many halachic authorities who permitted women to fulfill the mitzva of tefillin…if a consensus formed in the era of the *acharonim* [later authorities] that it is not fitting for a woman to lay *tefillin*, [then] because of the binding halachic principle that "halacha is in accordance with the later authorities," one must accept this decision straightforwardly in halachic practice, unless there are qualitative rationales with the power to change it in our time.

Overturning centuries of halachic rulings and tradition demands great halachic authority. Rav Herschel Schachter, a prominent halachic authority and Rosh Yeshiva of Yeshiva University, has taken up this theme:[[23]](#footnote-23)

Rav Herschel Schachter, "The Entire Assembly is Holy"

What is the rationale of those who permit? …as everyone knows, thus was the received practice from past generations, and who is he that gives the go ahead and is brazen to rule against a received ruling of our Rabbi the Rema…

…And the expression used by some who permit “that according to halacha” a certain action is permissible, and that those who are stringent want to forbid it only for “political reasons,” is incorrect. For this matter of changing tradition also constitutes an integral part of halacha...

Rav Schachter argues that halachic consensus going back centuries clearly prohibits women from laying *tefillin* – and that even constructing a convincing lenient argument based on the practice of earlier generations does not suffice to permit it.

Even were *guf naki* clearly understood and clearly obsolete, even were other halachic concerns addressed, Rav Schachter would be loath to permit women to lay tefillin, in light of tradition. In the case of *tefillin*, generations of practice and a charged history override potential arguments for leniency.

Among more recent halachic authorities, Rav Moshe Feinstein, who might allow for a woman wearing *tzitzit* in circumscribed [cases](http://www.deracheha.org/tzitzit-2-yuhara), flatly prohibits laying *tefillin*.

*Iggerot Moshe*, OC 4:49

Indeed, every woman is permitted to fulfill even *mitzvot* in which the Torah did not obligate them, and they have performed a mitzva and receive reward when fulfilling these *mitzvot*…Only regarding laying *tefillin* did Tosafot write that one needs to protest them because *tefillin* require extra zealousness with a *guf naki* and *hese’ach ha-da'at*, for which reason even men – who are obligated in *tefillin* – refrain from laying them all day long, rather just the brief time of the *shacharit* prayer, and so ruled Rema…

Rav Yehuda Henkin, too, writes that women may wear *tzitzt* in some circumstances, but finds no opening for laying *tefillin*. He writes:

Responsa *Benei Banim* II:3

You may not lay *tefillin,* as the halachic decisors wrote in [*Shulchan Aruch*] OC 38:3. They permitted Torah study for women as needed, but *tefillin* are not needed, and one should strengthen the connection to religion in other ways.

To the considerations we have seen, Rav Henkin adds the question of 'need.' A genuine need can sometimes create a halachic impetus for re-examining an issue, but it can be difficult to establish what counts as a case of genuine need. Rav Henkin does not recognize women seeking to lay *tefillin* as one.

In contrast, Rav Ya'akov Ariel does imagine a woman who deeply feels this need, and groups the question of *tefillin* with that of *tzitzit* as a mitzva which a woman may find support to fulfill:[[24]](#footnote-24)

Rav Ya'akov Ariel, Authentic Femininity vs. Imitation

If a woman feels a deep need in her soul to fulfill these *mitzvot* [*tzitzit* and *tefillin*], she has, perhaps, on whom to rely.

A more permissive recent opinion by a current halachic authority is that of Rav Eliezer Melamed, who suggests that if a woman sincerely seeks to serve God through wearing *tefillin* in private, she should be discouraged, but if she goes ahead, her act should not be protested:[[25]](#footnote-25)

*Peninei Halacha, "Women and Tefillin"*

Therefore, a woman who wants to elevate herself through *mitzvot* and asks whether she should wear *tefillin*should be instructed not to do so. If she nevertheless yearns to wear them in private, even though numerous authorities wrote that this is objectionable, one should not object, because there are opinions upon which she may rely. In general, whenever a practice has an authority on which to rely, one should not object to it.

Rav Melamed rules like Rema and does not question the present-day applicability of *guf naki.* He diverges from Rema's ruling, however, with regard to protest: While Rav Melamed would initially rule against a woman's laying *tefillin* in private, he would not protest her doing so, since there are earlier opinions on which she may rely. This remains a minority opinion in today's halachic landscape.

**Summary** Since Rema's ruling, halachic consensus has been to protest women's laying *tefillin*. For a woman to lay *tefillin*, she would have to be undeterred by that and by *guf naki* concerns. She would likely lay them in private, relying on the opinions that that would address halachic considerations of *keli gever*, modesty, and *yuhara*. Later authorities have been overwhelmingly opposed to this practice because of these other halachic concerns. This is the case even though the act of a woman laying *tefillin* may be considered a fulfillment of a mitzva from the Torah, and would have been permitted by some of our early halachic authorities in their day.

## **●** Why do tefillin not appeal to more women when they are so central to men's religious lives?

*Tefillin* are typically not of central interest to women. Here are some possible explanations for why this is the case:

* The exemption from the mitzva and protest of voluntary fulfillment creates distance from the mitzva. Most women not only do not lay *tefillin*, but rarely see them. Outside of a co-ed school or camp setting, the vast majority of observant women do not attend daily morning prayer services with any regularity.
* Many women, especially mothers of young children, struggle even to make time to pray, and laying *tefillin* takes more time. Women are exempt from reciting the paragraphs of Shema that relate to the mitzva of *tefillin*, which is the time when men must lay them.
* *Tefillin* are inaccessible. There is no way to feminize them, which presents a halachic, sociological, and psychological bar to women's laying them. They are also expensive, and wrapping them properly requires training.

Still, despite all the above, a woman may have her own sense of need that diverges from other women's, and she may ascribe great meaning to laying *tefillin*. That feeling should be acknowledged, even as even as we recognize the consensus that other halachic considerations override it here.

# Further Reading & Notes

1. Berger, Aliza. "Wrapped Attention: May Women Wear *Tefillin*?" In *Jewish Legal Writings by Women*, edited by Micah D. Halpern and Chana Safrai, 75-118. Jerusalem: Urim, 1998.

2. Brody, Shlomo "Women, *Tefillin*, and the Halakhic Process," *Torah Musings*, 2014.

<https://www.torahmusings.com/2014/02/women-tefillin-and-the-halakhic-process/>

3. Zivotofsky, Ari. "What's the Truth About…Rashi's Daughters?" *Jewish Action*, May, 2011.

<https://www.ou.org/jewish_action/05/2011/whats_the_truth_about-rashis_daughters/>

4. Lichtenstein, Aharon. "Hands Across the Ocean." *Jewish Action*, March, 2010.

<https://jewishaction.com/books/reviews/hands_across_the_ocean_a_review_of_rabbi_aharon_feldmans_the_eye_of_th/>

5. Puterkovsky, Malka. “*Din Ha-nashim Be-hanachat Tefillin.” in Mehalechet Be-darkah*, 113-152. Tel Aviv: Yedi'ot Sefarim, 2014.

1. Maharam here follows the approach of Ri, which we discussed in Tefillin II:

*Eiruvin* 96a *Tosafot* s.v. "Michal"

It makes sense to explain that the rationale of the one who says that it was not permissible [for Michal to lay *tefillin* voluntarily] is because *tefillin* require a *guf naki*, and women are not scrupulous to be careful. [↑](#footnote-ref-1)
2. *Orchot Chayyim* 1 *Hilchot Tefillin* 3

Maharam wrote that women are exempt from *tefillin* and if they come to lay them we do not listen to them, because they do not know how to keep themselves in cleanliness.

*Kol Bo* 21

Maharam wrote that women are exempt from *tefillin* because it is a positive time-bound commandment, for we do not lay them on Shabbat and festival days. And if they [women] want to lay [*tefillin*], we do not listen to them because they do not know how to keep themselves in cleanliness. [↑](#footnote-ref-2)
3. Cleanliness could really be an issue for women. The Talmud in Tractate *Nidda* extensively discusses soiling of women's outer clothing with blood (hers or from her environment), and Ri (*Shabbat* 11b *Tosafot* s.v."Hani") discusses the case of a woman's garment soiled by a child's urine. [↑](#footnote-ref-3)
4. There were customs in Ashkenaz for a woman to avoid contact with the sacred while actively menstruating. But early halachic discussions of women and *guf naki* do not explicitly invoke these customs. While a woman in *nidda* is permitted to hold a *sefer Torah* (OC 82:9), so long as her hands are not dirty, *guf naki* requirements for *tefillin* may differ, since *tefillin* are bound on the body.

Note, however, Kolbo 21 (paraphrasing *Semag Esin* 3), who maintains that *guf naki* requirements for *tefillin* must be more lenient than those for a *sefer Torah*:

*Kolbo* 21

This too I expounded for them, that what our sages said, that *tefillin* require a *guf naki* like Elisha Ba'al Kenafayim, is that one not sleep and should not pass gas in them, this is for a person who lays them all day long in accordance with their mitzva, lest he forget that they are on him and treat them improperly. But at the time of *tefilla*, there is no evil-doer who would not be fitting for *tefillin*, *a fortiori* from a Torah scroll which is more sanctified because it contains the entire Torah while *tefillin* only have the four portions, encased in leather. Everyone may hold a *sefer Torah* at the time of prayer, since everyone can conduct himself in purity at the time of prayer. [↑](#footnote-ref-4)
5. *Bet Yosef* OC 38

Maharam wanted to show concern for the words of the Pesikta.

See Tefillin I for a full discussion of these sources. [↑](#footnote-ref-5)
6. It is of interest in this context that Sefardi women did not have a practice of avoiding synagogue while menstruating and that Sefardi halachic decisors in general were less influenced by common practice than their Ashkenazi counterparts, two factors that may have contributed to the difference between the Rashba (Sefardi and lenient here) and the Maharam (Ashkenazi and stringent here). [↑](#footnote-ref-6)
7. *Orchot Chayyim*

And it is difficult for me from that which we say in *Eiruvin*, *Perek Ha-motze*, that Michal bat Shaul would lay *tefillin* and the sages did not protest her. Rashba permits them [women] all positive time-bound *mitzvot* and to recite a *beracha* based on this account, and they did not protest her, but she acted according to the will of the sages. And since she laid [*tefillin*] she certainly recited a *beracha*. [↑](#footnote-ref-7)
8. *Olat Tamid* 38:4 raises the possibility that the Bavli has no unique concern for a woman's *guf naki*, given that the discussion of women and *tefillin* does not mention it. He himself counters that it might not mention *guf naki* because it seeks to include bondsmen, which would not have the *guf naki* difficulties particular to women, in its explanation of the exemption.

Olat Tamid also suggests that a menopausal woman could lay *tefillin*, an argument dependent on interpreting the issue of women and *guf naki* as confined to menstruation.

See [here](https://he.wikisource.org/wiki/%D7%A2%D7%95%D7%9C%D7%AA_%D7%AA%D7%9E%D7%99%D7%93_%D7%A2%D7%9C_%D7%90%D7%95%D7%A8%D7%97_%D7%97%D7%99%D7%99%D7%9D_%D7%9C%D7%97). [↑](#footnote-ref-8)
9. *Eshel Avraham* 38:3

And it is understood that we protest even against laying them only at the time of *keri’at Shema* and prayer, for they do not know how to be careful [↑](#footnote-ref-9)
10. Fascinatingly, he goes on there to quote a passage from Arizal that suggests that were women to lay *tefillin*, it would have to be in the likeness of the kabbalistic feminine. [↑](#footnote-ref-10)
11. For further discussion of *yuhara*, please see [here](https://deracheha.org/tzitzit-2-yuhara). [↑](#footnote-ref-11)
12. We see a similar idea in Beit Yosef, who discusses the possibility of covering up the knot as a way to address a concern for *yuhara*:

*Beit Yosef* OC 27

We are concerned for *yuhara* and [therefore] cover it [the knot]. [↑](#footnote-ref-12)
13. *Shulchan Aruch* OC 27:9

The proper place for laying the *tefilla shel rosh* is from the beginning of the hair roots from his forehead until the end of the place where a baby's head is soft. [↑](#footnote-ref-13)
14. *Shulchan Aruch* OC 27:10

The knot behind the head must be at the high point of the back of the neck.

The place of the knot that is seen must be like a *dalet* shape facing outward. [↑](#footnote-ref-14)
15. See, for example, Magen Avraham 8:3. [↑](#footnote-ref-15)
16. *Shulchan Aruch* OC 27:4

Nothing may separate between *tefillin* and one’s flesh, neither on the hand nor on the head. [↑](#footnote-ref-16)
17. *Mishna Berura* 27:16

They wrote a clear rebuke against those who lay *tefillin*over a wig...even if just the strap is laid on the wig. In any case it is understood from the words of Magen Avraham and Chayei Adam that if he has a wound on his head, only where the straps lay and not in the place of the *bayit*, he is permitted to lay the straps on bandages on the wound or on a thin cap and to recite the *beracha*... [↑](#footnote-ref-17)
18. Mishna Berura 27:15

He wrote in the book *Machatzit Ha-shekel*, “I am displeased with the actions of those men that grow their hair long in front. Aside from this being brazen and arrogant, see what is written in *Yoreh De'ah* 176 that it also entails a prohibition of laying *tefillin*, for since [these hairstyles] are so big, one cannot say that this is [the hair’s natural] growth and they are a *chatzitza* (halachic barrier).” See there. Even without [the factor of] *chatzitza*, with so much hair it is also impossible to tighten [the straps] so that they are flush and rest in their place in accordance with the halacha. [↑](#footnote-ref-18)
19. For a blogger's first-person account of trying to address these issues, see [here](https://onthefringe_jewishblog.blogspot.com/2010/11/tefillin-challenge-surprise-ending-i.html). [↑](#footnote-ref-19)
20. *Shulchan Aruch* OC 27:1

The proper place to lay them on the arm is on the left arm where the flesh bulges over the bone between the elbow and the armpit. [↑](#footnote-ref-20)
21. Masat Binyamin (end of responsum 62) has been cited by Berger and Brody as theoretically implying such permission, but that is not clear from his discussion.

As we saw in [Tefillin II, note 12](https://www.deracheha.org/tefillin-2-guf-naki/?target=in-depth#n12), Olat Tamid's position 38:3 is summarily refuted by the Magen Avraham there.

Tehilla Le-David poses his question rhetorically, aware of Eshel Avraham's response:

*Tehilla Le-David* 38:3

Since women are obligated in prayer, they must be capable of avoiding flatulence during prayer. Also regarding distraction, one need not be concerned during prayer...If so, we should investigate whether one must protest women when they want to lay them [*tefillin*] during prayer, for it may be that what Rema wrote...applies when they wish to lay them all day long. But see *Eshel Avraham* 3.

*Peri Megadim* OC *Eshel Avraham* 38:3

It implies that even [for women] to lay them just at the time of *keri’at Shema* and prayer, we protest, for they do not know how to be careful.

Rav Eliezer Berkovits permits women to lay *tefillin* in an article that calls for a wholesale reevaluation of women's exemption from positive time bound *mitzvot*. R. Eliezer Berkovits, “*Hit’chayvut Atzmit shel Nashim*,” *Sinai* 100 (5747). His arguments have not found support among other halachic authorities. [↑](#footnote-ref-21)
22. See here: <http://matzav.com/sar-principal-explains-decision-to-allow-girls-to-wear-tefillin-at-school-minyanim/>   [↑](#footnote-ref-22)
23. Available here: http://www.scribd.com/doc/206028408/Rav-Herschel-Schacter-Ladies-Tefillin [↑](#footnote-ref-23)
24. Rav Ya'akov Ariel, "Authentic Femininity vs. Imitation," *Halacha Be-yameinu* (Ashkelon: *Machon Ha-Torah Ve-ha-aretz*, 2010), 253. [↑](#footnote-ref-24)
25. <https://ph.yhb.org.il/en/03-21-06/> [↑](#footnote-ref-25)